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REGULATORY AUTHORITY
James B. Wright
Senior Attorney
SEP 5 AM 11 57
OFFICE OF THE
EXECUTIVE SECRETARY

14111 Capital Boulevard
Wake Forest, North Carolina 27587-5900
Telephone: 919-554-7587
Fax: 919-554-7913

September 1, 2000

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

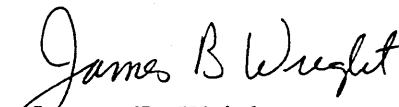
RE: Docket No. 97-00409 (Pay Telephone Tariffs)
UTSE Response to CAD's Motion to Compel

Dear Mr. Waddell:

Enclosed for filing in the above case are the original and thirteen copies of United Telephone-Southeast, Inc.'s Response to the Consumer Advocate's Motion to Compel.

A copy of this Response is being furnished to counsel of record.

Sincerely yours,


James B. Wright

JBW:sm

Enclosure

CC: Steve Parrott (with enclosure)
Dennis Wagner (with enclosure)
Laura Sykora (with enclosure)
Counsel of Record (with enclosure)

#18342

POSTED
9-5-00

BEFORE THE
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

IN RE: All Telephone Companies Tariff Filings Regarding Reclassification of
Pay Telephone Service as Required by FCC Docket 96-128

DOCKET NO. 97-00409

UTSE RESPONSE TO
CAD MOTION TO COMPEL AND TO MODIFY SCHEDULING ORDER

United Telephone-Southeast, Inc. ("United" or "Company"), files this response to the Motion to Compel and to Modify Scheduling Order dated August 25, 2000 ("Motion") filed by the Consumer Advocate Division ("CAD").

United would first point out that the Motion itself is extremely vague as to exactly which discovery responses the CAD seeks an order to compel. However, accompanying the Motion was a copy of United's responses to Interrogatory Questions 1 and 6 and United therefore considers these two responses to be the subject of this Motion.

As to Question 1, the CAD requested that United provide a cost study identifying the cost of providing payphone lines "conforming to decisions made by the Tennessee Regulatory Authority in the Phase I order (5/20/98) and the Phase II order (9/16/99) in Docket 97-00888 (Universal Service Proceeding), and the Phase I order (1/25/99) in docket 97-01262 (BellSouth permanent price or UNE docket)". United responded it did not have a study conforming to the decisions in

both dockets. First, no such study was in existence and United does not believe it has an obligation to procure information from other sources to create such a study. Second, such a study could not be created since the two proceedings obviously involve different purposes, thus different methodologies were used. With respect to the UNE proceeding, BellSouth utilized and the TRA approved a TELRIC Calculator model which is not a model used or supported by United and which likely includes different cost attributes from those maintained by United. Third, since United's USF filings were based on the BCPM cost model, the creation of the study requested by the CAD would no longer be relevant to this proceeding given the TRA's decision on August 15, 2000 in the USF proceeding approving the HAI cost model.

At this point in time United does not believe any cost study can be created to respond to the CAD's Interrogatory Question 1. The only possible partially responsive study the company is aware of would be the revised HAI cost study for United's serving area filed by AT&T in the USF proceeding on September 30, 1999 and revised on November 23, 1999 ("AT&T HAI Study"). CAD was a party to that proceeding and if deemed relevant by the CAD in this proceeding, it may wish to consider use of that information in preparing its case. United makes no representation as to the extent to which the AT&T HAI Study is compliant with the USF or UNE proceeding methodology.

As to Question 6, the CAD asked for United to explain why it considered its proposed methodology to be superior to the UNE cost methodology for

determining the costs of pay phone access lines. United provided a detailed explanation of its reasons, even though United had no obligation to do so since United's cost study methodology and supporting information are not due to be filed until September 15 under the procedural schedule adopted in this case. United does not believe any further response is necessary. The CAD can issue additional discovery regarding United's cost studies after United files its studies. Thus, there is no basis on this issue for an order to compel.

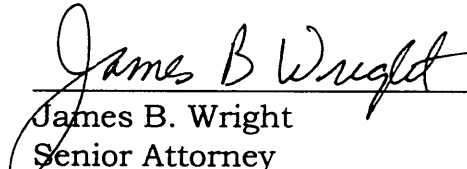
The last line of the CAD's Motion asks that the schedule be modified. The CAD makes no attempt to explain why or to what extent a modification is necessary. For these reasons this portion of the Motion must be denied.

Wherefore United asks that the Motion be denied in its entirety.

Respectfully submitted,

UNITED TELEPHONE-SOUTHEAST, INC.

Dated: August 31, 2000


James B. Wright
Senior Attorney
14111 Capital Boulevard
Wake Forest, North Carolina 27587

CERTIFICATE OF SERVICE; DOCKET 97-00409
(Pay Telephone Service Reclassification)

The undersigned hereby certifies that on September 1, 2000 the foregoing UTSE Response to CAD Motion to Compel was served upon the following parties of record by fax or by depositing in the U.S mail addressed as follows:

Richard Collier
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Ted G. Pappas
Bass, Berry & Simms
2700 First American Center
Nashville, TN 37238

Vincent Williams
Consumer Advocate Division
425 Fifth Avenue North, 2nd Fl.
Nashville, TN 37243

Guilford R. Thornton, Jr. Esq.
Stokes & Bartholomew
424 Church St, Suite 2800
Nashville, TN 37219-2386

Guy M. Hicks
BellSouth Telecommunications
333 Commerce St., Suite 2101
Nashville, TN 37201-3300

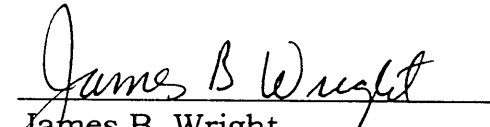
James P. Lamoureux
AT&T Communications
1200 Peachtree Street, Room 4060
Atlanta, Georgia 30309

John Adams
Citizens Telecom
1400 16th St., NW, #500
Washington, DC 20036

Val Sanford
Gullett, Sanford, Robinson & Martin
230 Fourth Avenue, North, 3rd Floor
Nashville, TN 37219-8888

Henry Walker
Boult, Cummings, Conner & Berry
414 Union Street, Suite 1600
Nashville, TN 37219

Jon E. Hastings
Boult, Cummings, Conner & Berry
414 Union Street, Suite 1600
Nashville, TN 37219-1777


James B. Wright